

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
DAVID KUEHEN,)	
)	
Plaintiff)	
)	
v.)	CIVIL ACTION NO: 05-10574(RGS)
)	
DR. AMELIA HAYGOOD,)	
CAROL ROSENBERGER,)	
AND DELOS INTERNATIONAL, INC.)	
)	
)	
Defendants.)	
_____)	

PLAINTIFF'S OPPOSITION TO
MOTION TO DISMISS OR TRANSFER VENUE

The Plaintiff, David Kuehn, herby opposes the Motion of Defendants Haygood, Rosenberger, and Delos International, Inc. to dismiss this action or transfer venue. As grounds for his Opposition, the Plaintiff states: (1) the Defendants are subject to personal jurisdiction under Mass.Gen.Laws ch. 223A, §3(a); (2) the assertion of jurisdiction over the Defendants is consistent with due process; and (3) venue is appropriate in Massachusetts. In support of his Opposition, the Plaintiff submits Plaintiff's Memorandum In Opposition To Motion To Dismiss Or Transfer Venue and Affidavit of David Kuehn. The Plaintiff hereby requests that the Defendants' Motion be denied.

Respectfully Submitted,
DAVID KUEHN, Plaintiff
By his attorney,

/s/ Eugene R. Curry
Eugene R. Curry (BBO #549239)
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DATED: May 31, 2005

